

EXHIBIT 1

Declaration of
Jay M. Wolman

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JONATHAN MONSARRAT,

Plaintiff,

v.

GOTPER6067-00001 and DOES 1-5,
dba ENCYCLOPEDIADRAMATICA.SE,
and BRIAN ZAIGER,

Defendants.

CIVIL ACTION NO.
1:17-cv-10356-PBS

**DECLARATION OF
JAY M. WOLMAN**

I, JAY M. WOLMAN, declare:

1. I am over 18 years of age and have first-hand knowledge of the facts set forth herein, and if called as a witness could and would testify competently thereto.

2. I am an attorney licensed to practice law in the Commonwealth of Massachusetts and before the Bar of this Court.

3. I am an attorney of record for Defendant Brian Zaiger in this action, and I submit this declaration in support of Defendant Brian Zaiger's Opposition to Plaintiff's Motion to File Exhibits C and D to Amended Complaint Under Seal ("Defendant's Opposition").

4. During the course of discovery in this case, Plaintiff produced two versions of the webpage at issue in his Responses to Defendant's first set of interrogatories as Exhibits C & D thereto.

5. Upon information and belief, those same exhibits are the intended Exhibits C & D to the putative Amended Complaint.

6. Those exhibits contain advertisements purporting to be for the website "fuckbook.com".

7. The banner ads for "fuckbook.com" contain images of breasts and genitalia.

8. Five women and two men appear to be visible in the advertisements.

9. For two of the models, only their genitalia is shown; the rest appear to be young women and one man at least 18 years old.

10. Plaintiff's counsel informed me that he has not filed copies of the exhibits, but would bring unredacted versions to a hearing.

11. Plaintiff served his answers to the interrogatories, with the exhibits, without any warning they might contain child pornography.

12. Exhibit 2 to Defendant's Opposition is a true and correct copy of the webpage located at <<https://www.fuckbook.com/en/about/record-keeping-requirements>>.

13. Exhibit 3 to Defendant's Opposition is a true and correct copy of the webpage located at <<https://www.1888pressrelease.com/johnny-monsarrat/jonathan-monsarrat/jon-monsarrat-160-million-dotcom-icon-to-expose-100-cyber-pr-470259.html>>.

14. Exhibit 4 to Defendant's Opposition is a true and correct copy of Patent No. 7,647,351, as accessible at <<https://patentimages.storage.googleapis.com/cb/d9/0d/f06a0cc33d5045/US7647351.pdf>>.

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15. Exhibit 5 to Defendant's Opposition is a true and correct copy of Plaintiff's Responses to Defendant's first set of interrogatories, as served by Plaintiffs on October 2, 2017, except that the Fuckbook.com ads have been redacted to censor explicit content.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 20, 2017.

/s/ Jay M. Wolman
Jay M. Wolman